

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WISCONSIN

IN RE:

Jennifer McKinney  
Israel R. McKinney  
Debtors.

Case No. 22-11558

NOTICE OF MOTION FOR RELIEF OF AUTOMATIC STAY

**PLEASE BE ADVISED** that Marine Credit Union, secured claimant of the debtors, Jennifer McKinney and Israel R. McKinney, and party in interest, has filed papers with the court to grant to creditor relief of the automatic stay.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant to creditor, Marine Credit Union, relief from the automatic stay, or if you want the court to consider your views on the motion, then within 14 days after date of this notice you or your attorney must file with the court a written request for a hearing, or, a written response, explaining your position at:

United States Bankruptcy Court  
Western District of Wisconsin  
120 N. Henry Street  
Madison, WI 53703

If you mail your request to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

You must also mail a copy to:

VANDE ZANDE & KAUFMAN, LLP  
408 E. Main Street  
Waupun, WI 53963

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Dated this 23 day of December, 2022.

VANDE ZANDE & KAUFMAN, LLP

By:

Sam Kaufman  
State Bar No. 1023976

P.O. ADDRESS:  
408 E. Main Street  
Waupun, WI 53963  
Phone: (920) 324-2951

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WISCONSIN

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IN RE:

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Israel R. McKinney  
Debtors.

Case No. 22-11558

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MOTION FOR RELIEF OF THE AUTOMATIC STAY

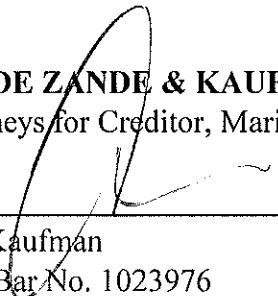
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Movant, Marine Credit Union, moves the Court pursuant to 11 U.S.C. §362 (d) of the Bankruptcy Code for an Order for abandonment and terminating, annulling, or modifying the stay imposed by §362 (d) of the Bankruptcy code; that any order entered pursuant to this motion be effective immediately upon its entry in regard to movant's mortgage interest in Debtors' property located at W5441 Innsbruck Road, West Salem, Wisconsin (the "Property").

If the court denies Marine Credit Union's request for relief from the automatic stay, then Movant requests a hearing for a determination of adequate protection of its interest in the subject real estate.

Dated this 23 day of December, 2022.

**VANDE ZANDE & KAUFMAN, LLP**  
Attorneys for Creditor, Marine Credit Union



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Sam Kaufman  
State Bar No. 1023976

P.O. ADDRESS:

PO Box 430  
Waupun, Wisconsin 53963  
Phone: (920) 324-2951

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WISCONSIN

IN RE:

Jennifer McKinney  
Israel R. McKinney  
Debtors.

Case No. 22-11558

EVIDENTIARY AFFIDAVIT IN SUPPORT OF MOTION FOR  
RELIEF OF AUTOMATIC STAY

STATE OF WISCONSIN )  
 ) SS  
COUNTY OF LA CROSSE )

I, Dean Chady, first being duly sworn on oath states the following:

1. I am employed with the creditor, Marine Credit Union, in the capacity of Director of Lending Administration. I have personal knowledge of and am familiar with the loan files of the debtors, McKinney, in the subject transaction and am authorized to make this affidavit.
2. I have reviewed the loan documents executed by the debtors. Attached are a true and correct copy of the note and mortgage executed by the debtors. To secure the subject note the debtors conveyed to Marine Credit Union a mortgage interest in real property located at W5441 Innsbruck Road, West Salem, WI. Marine Credit Union remains the owner of the subject note and mortgage and has not assigned its interest to any third parties. That the subject property is the homestead of the debtor, Israel R. McKinney.
3. The debtors filed the entitled Chapter 13 proceeding. As of today the debtors have failed to pay the post petition installments due for the months of 11/5/22 - \$3,964.26 and 12/5/2022 - \$3,964.26. The total amount past due is \$7,928.52. Attached is a true and correct copy of the debtor's payment history for the last 12 months. The balance owing to Marine Credit Union is \$312,526.90. The 2022 property assessed value is \$404,500.00.
4. That this affidavit is made in support of creditor's request that an Order be issued, effective upon entry, directing the debtor to pay sufficient funds to cure the post petition delinquency or in the alternative, granting to Marine Credit Union a relief from the automatic stay.

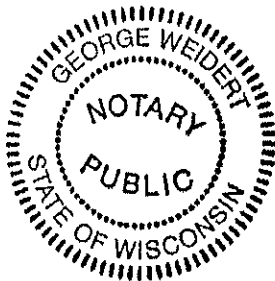
Subscribed to and sworn  
to before me this 23rd day of December, 2022.

*George Weidert*

Notary Public, County of La Crosse,  
State of Wisconsin, My Commission expires: 1/13/2025

By:

*Dean Chady*  
Dean Chady



UNITED STATES BANKRUPTCY COURT  
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CERTIFICATE OF ELECTRONIC FILING AND MAILING

Sam Kaufman, of Vande Zande & Kaufman, LLP, in Waupun, Wisconsin, being sworn, states that on December 23, 2022 he electronically filed and/or mailed, properly enclosed in a postpaid mail envelope, a copy of the filed Notice of Motion and Motion for Relief of Automatic Stay, Motion for Relief of Stay, Affidavit of Dean Chady and Certificate of Mailing in the above entitled action to each of the following named persons, at the proper post office address listed below:

Jennifer McKinney  
429 S. 2nd St. N #322  
West Salem, WI 54601

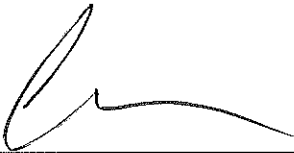
Attorney Mark Harring - Trustee  
122 West Washington Ave #500  
Madison, WI 53703

Israel R. McKinney  
W5441 Innsbruck Road  
West Salem, WI 54669

Attorney Greg Pittman  
712 Main Street  
La Crosse, WI 54601

All Creditors Identified on the  
attached mailing matrix

Dated this 23 day of December, 2022.



Sam Kaufman

**1-22-11558-rmb** Jennifer McKinney and Israel R. McKinney  
**Case type:** bk **Chapter:** 13 **Asset:** Yes **Vol:** v **Bankruptcy Judge:** Rachel M Blise  
**Date filed:** 09/27/2022 **Date of last filing:** 12/22/2022

## Creditors

**American Accounts & Advisers** (5014305)  
Attn: Bankruptcy (cr)  
Po Box 250 (09/27/22)  
Cottage Grove, MN 55016

**Americollect, Inc.** (5014306)  
PO Box 1566 (cr)  
Manitowoc, WI 54221 (09/27/22)

**Bonneville Collections** (5014307)  
Po Box 150621 (cr)  
Ogden, UT 84415 (09/27/22)

**Credit Bureau Data Inc** (5014308)  
Attn: Bankruptcy (cr)  
518 State Street Po Box 2288 (09/27/22)  
La Crosse, WI 54602

**Credit Collection Services** (5014309)  
Attn: Bankruptcy (cr)  
725 Canton St (09/27/22)  
Norwood, MA 02062

**Department of Treasury - Internal Revenue Service** (5014312)  
PO Box 7346 (cr)  
Philadelphia, PA 19101-7346 (11/23/22)

**Enhanced Recovery Company** (5014310)  
Attn: Bankruptcy (cr)  
8014 Bayberry Road (09/27/22)  
Jacksonville, FL 32256

**Gundersen Health System** (5014311)  
1900 South Ave. (cr)  
La Crosse, WI 54601 (09/27/22)

**Marine Credit Union** (5021629)  
Attn: Collections Dept ()  
P.O. Box 309 ()  
Onalaska, WI 54650

**Marine Cu** (5014313)  
Attn: Bankruptcy (cr)  
Po Box 309 (09/27/22)  
Onalaska, WI 54650

**National Service Bureau, Inc** (5014314)  
18912 North Creek Parkway (cr)

Suite 205 (09/27/22)

Bothwell, WA 98011

**SOUTHEASTERN EMERGENCY PHYSICIANS, LLC** (5021483)  
 c/o Wakefield & Associates, LLC (cr)  
 PO Box 51272 (11/04/22)  
 Knoxville, TN 37950-1272

**VISTA RADIOLOGY PC** (5021482)  
 c/o Wakefield & Associates, LLC (cr)  
 PO Box 51272 (11/04/22)  
 Knoxville, TN 37950-1272

**Wakefield & Associates** (5014315)  
 Attn: Bankruptcy (cr)  
 7005 Middlebrook Pike (09/27/22)  
 Knoxville, TN 37909

PACER Service Center			
Transaction Receipt			
12/23/2022 13:02:41			
<b>PACER Login:</b>	Kaufman2020	<b>Client Code:</b>	
<b>Description:</b>	Creditor List	<b>Search Criteria:</b>	1-22-11558-rmb Creditor Type: All
<b>Billable Pages:</b>	1	<b>Cost:</b>	0.10